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Subject: Heliports

FAA 99-6411-41

March 30, 2000

Mr. Robert Bonanni, PE
Design and Operations Criteria Division, AS-100
Office of Airport Safety and Standards
Federal Aviation Administration
800 Independence Avenue, S. W.
Washington, DC 20591

Re: Draft A. C. 150/5390-2B

Dear Sir,

Upon review of the recently released draft of the Heliport Advisory Circular I find it a vast improvement over the original draft. There are however still some problems.

I am disturbed and disappointed by the elimination of the "Private" category of heliport. Apparently the FAA does not feel that private heliports are not important enough to offer even "recommended" safety standards. This is truly unfortunate because the vast majority of heliports are "private." If a Very Important Person were to be involved in an incident on a "private" heliport, the FAA witness at the inevitable Congressional hearing would find it very uncomfortable trying to explain why the FAA was so uncaring.

Specific comments follow:

p. 16 Paragraph 202.e

The requirement that the safety areas of two adjacent FATOs may not overlap for simultaneous operations is unnecessary. The previous paragraph (d) indicates that a FATO is closed if a static object is within the FATO or the associated safety area. If a helicopter parked on an adjacent FATO intrudes into the common safety area then the clear FATO cannot be used. BY implication, if the common safety area is clear than the empty FATO can be used.

p. 16 Paragraph 204.a and b

This section no longer references FAR Part 77. Is Part 77 no longer

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applicable to heliport approach and departure paths?

p. 17 Paragraph 204.f

This paragraph implies that approach and departure paths must be designed with emergency land sites. This may not be possible. I would recommend that the statement "whenever practical" be added.

p. 58 Paragraph 301.a (1) and (2)

The figures specified as 3-2 and 3-3 should be 4-2 and 4-4 or perhaps the Figures themselves are out of sequence.

p. 58 Paragraph 301.b

Why is the TLOF a rectangular surface? Many elevated TLOFs are circular. This is unnecessarily specific.

P. 59 Paragraph 302.e

The requirement that the safety areas of two adjacent FATOs may not overlap for simultaneous operations is unnecessary. The previous paragraph (d) indicates that a FATO is closed if a static object is within the FATO or the associated safety area. If a helicopter parked on an adjacent FATO intrudes into the common safety area then the clear FATO cannot be used. BY implication, if the common safety area is clear than the empty FATO can be used.

p. 59 Paragraphs 304.a and b

This section no longer references FAR Part 77. Is Part 77 no longer applicable to heliport approach and departure paths?

p. 59 Paragraph 304.c

Refers the reader to paragraph 311 which, in turn refers the reader back to 304 (!?!) and to paragraph 107 which, in turn refers the reader to AC 70/7460-1. You guys been taking lesson from the IRS? Simply refer to the AC on marking and lighting where appropriate and drop all the references.

p. 60 Paragraph 304.f

This paragraph implies that approach and departure paths must be designed with emergency land sites. This may not be possible. I would recommend

that the statement "whenever practical" be added.

p. 60 Paragraph 305

The Protection Zone has been extended from 280 feet (which corresponds to 35 feet above the heliport at a 1:8 gradient) to 400 feet. What is the justification. Helicopters operating from Transport Category heliport will be operating (by definition) to Category A rules with the ability to clear any obstacle with a failed engine. So what is the advantage to extending the Protection Zone 120 additional feet?

Sincerely,

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